

CERTIFIED MAIL

February 14, 2005

Asarco, Inc.
P.O. Box 1677
Tacoma, WA 98401-1677

Murray Pacific Corp.
3502 Lincoln Avenue East
Tacoma, WA 98421-4399

Executive Bark, Incorporated
1621 Marine View Drive
Tacoma, WA 98422-4198

Dear Sirs:

Re: B & L Woodwaste Site, Order No. DE 92TC-S214, Second Amendment

Please find enclosed Amendment No. 2 to the B & L Woodwaste Site Enforcement Order No. DE 92TC-S214 of June 17, 1992. All correspondence related to this document should be directed to Dom Reale, Department of Ecology, Southwest Regional Office, P.O. Box 47775, Olympia, WA 98504-7775. If you have any questions regarding the content of the document, please call Mr. Reale at 360-407-6266.

Sincerely,

Rebecca Lawson, P.E.
Southwest Region Supervisor
Toxics Cleanup Program
Department of Ecology

DR/RSL/ksc:cover letter BLww Order

Cc: Dom Reale, Ecology
Molly Gibbs, Ecology
Robert Warren, Ecology

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

In the matter of compliance at)	ORDER
The B & L Woodwaste Site)	No. DE 92TC-S214
With Chapter 70.105D RCW)	Second Amendment
And the Rules and Regulations)	
Of the Department of Ecology)	

To: Asarco, Incorporated
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Order No. DE 92TC-S214, dated June 17, 1992 as amended (the Order), is hereby further amended as follows:

1. The Respondents shall resume and complete implementation of the document entitled, "Contingency Plan for the B & L Landfill", dated June 2001 (hereafter referred to as the Contingency Plan), as amended by Ecology 's letter of July 12, 2001 (Enclosure 1). The Ecology-approved Contingency Plan construction shall be completed no later than October 15, 2006. In implementing the Contingency Plan, the Respondents shall follow the "Process Schematic for Development, Design and Implementation of the Groundwater Control Contingency Action" (Figure 4-1-1 of the Contingency Plan, Enclosure 2). Respondents shall perform the Contingency Plan work in conformance with the schedule detailed in the enclosed document (Enclosure 3) entitled, "Proposed 2005 Contingency Plan Schedule".
2. The scope of the Contingency Plan shall be expanded to also include an additional work phase, consisting of the study, design and implementation, with Ecology approval, of measures needed to remediate the wetland area adjacent to the Site. This adjacent wetland (as shown in Figure 1-1-8 of the Contingency Plan), located across the Puget Power access road from the Site, has shown impacts to groundwater by arsenic, and possibly other toxic constituents, from the Site. Within two (2) months from the date of issuance of this Order the Respondents shall provide for Ecology approval a draft Scope of Work and schedule for proposed wetland remedy selection (including any testing proposed to support remedy selection), ensuing remedy implementation, and follow-up monitoring. The remedies to be considered shall undergo a Feasibility Study in accordance with 173-

340-360 and range from passive (i.e.-monitored natural attenuation) to active (i.e.-pumping of groundwater or insitu chemical treatment) and will be coordinated with the Groundwater Control Contingency Action specified in paragraph 1 above.

3. As part of the work phase entitled, "Design Analysis of Contingency Alternatives for Groundwater Control and/or Treatment" the Respondents shall conduct a test of pumping of groundwater from the Site sump, and providing Ecology-approved treatment and/or disposal for the extracted fluid. Sump groundwater pumping rate shall be maintained at the highest instantaneously sustainable rate for a period of time approved by Ecology. This test of pumping groundwater from the Site sump will provide hydrogeologic information relating to aquifer permeability, pumping capacity/yield, tracking the level of the groundwater surface with respect to the lowest point of waste in the landfill, and it should also show trends in heavy metals concentrations and wood waste leachate concentrations within the landfill and around its perimeter as pumping continues. This information is to be included along with the "Design Analysis of Contingency Alternatives for Groundwater Control and/or Treatment" report to Ecology. Depending upon the results of the sump pumping, and the outlook for continued project funding by the PLPs, pumping and treatment of the Site sump may be required by Ecology as an Interim Action for Site remediation.
4. Beginning in January 2005, Respondents shall resume semi-annual (wet and dry season) sampling and reporting per the Order as amended. These reports shall include:
 - A. mapping of the Site and off-Site groundwater plume(s) of arsenic and other Site leachate constituents;
 - B. Site groundwater, perimeter surface water and wetland sampling results;
 - C. A description of actions taken in the previous six month period with respect to the Contingency Plan;
 - D. Mapping and tabular summary of data collected and results of any field testing, or bench or pilot scale treatability testing performed.

Treatability testing results should be forwarded to Ecology no less frequently than quarterly. As requested by the PLPs, phenols may be deleted from the list of testing parameters, since it has never been detected during the past 11 years of monitoring.

Effective date of this Order: _____.

Rebecca S. Lawson, P.E.
Regional Section Manager
Southwest Regional Office
Toxics Cleanup Program